

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

YUNNAN DUOBANG NETWORK
TECHNOLOGY CO LTD,

Plaintiff,

v.

AMAZON.COM SERVICES LLC,

Defendant.

No. 2:23-cv-01137-JCC

**STIPULATED MOTION TO SEAL
PREVIOUSLY FILED EXHIBIT
AND REPLACE WITH REDACTED
FILING AND [PROPOSED] ORDER**

Pursuant to Local Civil Rule 5(g), Defendant Amazon.com Services LLC (“Defendant” or “Amazon”), and Plaintiff Yunnan Duobang Network Technology Co Ltd (“Plaintiff”), file this Stipulated Motion to Seal Exhibit G to the Declaration of John Goldmark, Dkt. 21-7, and for leave to substitute that filing with a redacted version of Exhibit G.

STIPULATED MOTION

The parties jointly move for an order sealing the previously filed Exhibit G to the Declaration of John Goldmark, Dkt. 21-7, pursuant to Local Civil Rule 5(g) and for an order granting Amazon leave to substitute that submission with the redacted version of Exhibit G submitted herewith as an attachment to the Declaration of Arthur Simpson.

Local Civil Rule 5(g)(3) permits the sealing of confidential information upon a showing of “the legitimate private or public interests that warrant the relief sought; the injury that will

1 result if the relief sought is not granted; and why a less restrictive alternative to the relief sought
 2 is not sufficient.” LCR 5(g)(3). The Court may seal judicial records when a party provides a
 3 compelling reason to keep information out of the public view. *Kamakana v. City & County of*
 4 *Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006). While “[w]hat constitutes a ‘compelling reason’
 5 is ‘best left to the sound discretion of the trial court’” a court “commit[s] clear error” by refusing
 6 to seal “confidential and commercially sensitive information . . . from public disclosure.” *Ctr.*
 7 *for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1097 (9th Cir. 2016) (quoting *Nixon v.*
 8 *Warner Commnc’ns, Inc.*, 435 U.S. 589, 599 (1978); *In re Elec. Arts, Inc.*, 298 F. App’x 568, 569
 9 (9th Cir. 2008).

10 Compelling circumstances exist for the Court to seal Exhibit G and grant Amazon leave
 11 to file a redacted version of that exhibit in this case. Three columns of data within Exhibit G,
 12 which is an Excel spreadsheet, contain certain types of information that should be kept
 13 confidential. These categories are Amazon Seller IDs, Customer IDs, and the reason why a
 14 certain review may have been suppressed. While this information is anonymized and does not
 15 contain Amazon customer or seller Personally Identifiable Information, Amazon seeks to redact
 16 it from Exhibit G out of an abundance of caution and in the interest of protecting the security and
 17 privacy of the Amazon customers and sellers whose anonymous Seller IDs or Customer IDs are
 18 listed in Exhibit G. In order to comply with the spirit of LCR 5(G)(3)(B)(iii), which requires a
 19 movant seeking to file a document under seal to show why a less restrictive alternative to the
 20 relief sought is not sufficient, Amazon proposes to file a redacted version of Exhibit G rather
 21 than seal Exhibit G in its entirety.

22 **LOCAL CIVIL RULES 5(g)(3)(A), 7(e) CERTIFICATION**

23 Pursuant to Local Rule 7(g)(3)(A), Amazon’s undersigned counsel certifies that on
 24 November 2, 2023, Amazon’s counsel, Arthur Simpson, telephonically met-and-conferred with
 25 Plaintiff’s counsel, Adam Urbanczyk, and the parties agreed to submit the joint request for relief
 26 set forth in this Stipulated Motion, and that the relief requested complies with Local Civil Rule
 27 5(g)(3)(A)’s requirements.

Amazon's undersigned counsel also certifies that this memorandum contains 528 words,
in compliance with the Local Civil Rules.

STIPULATED to this 6th day of November 2023.

MANN LAW GROUP PLLC & AU LLC
*Attorneys for Plaintiff Yunnan Duobang
Network Technology Co., Ltd.*

DAVIS WRIGHT TREMAINE LLP
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By /s/ Adam E. Urbanczyk

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By /s/ Arthur Simpson

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[PROPOSED] ORDER

The parties jointly moved the Court for an Order to Seal Exhibit G to the Opposition to Plaintiff's Motion to Vacate Arbitration Award and Cross-Motion to Confirm Arbitration Award (Dkt. No. 21-7), and to permit Amazon to file a redacted version of Exhibit G in its place. The motion to seal (Dkt. No. 22) is GRANTED and the Clerk is DIRECTED to maintain Docket Number 21-7 under seal.

Dated this 7th day of November 2023.

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

John C. Coughenour
UNITED STATES DISTRICT JUDGE